

EX PARTE OR LATE FILED

ACIL

June 30, 1999

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
Room TW-A325  
445 12<sup>th</sup> Street SW  
Washington, D.C. 20554

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Re: Ex-Parte Presentation as permitted by FCC Public Notice dated June 10, 1999, Common Carrier Bureau Will Hold Fora on Deregulation/Privatization of Equipment Registration and Telephone Network Connection Rules (47 C.F.R. Part 68), CC Docket No. 99-216, DA 99-1108

Dear Ms. Salas:

ACIL hereby submits this request for an in-person ex-parte presentation during the FCC's Public Fora as permitted in the FCC Public Notice released June 10, 1999, in the matter of the Common Carrier Bureau's Fora on Deregulation/Privatization of Equipment Registration and Telephone Network Connection Rules CC Docket No. 99-216, DA 99-1108.

ACIL (formerly the American Council of Independent Laboratories) is the national trade association representing independent commercial scientific and engineering testing firms. Affiliated membership is available to manufacturers' laboratories, consultants and suppliers to industry. The association was founded in 1937.

This request is for an ex-parte presentation in Forum 3.

The following is a summary of the requested ex-parte presentation:

**FORUM 3:**

Under the concerns to be discussed in this Forum, the FCC requests inputs on how the certification procedural rules could be streamlined either by the Government or private entities. In addition, the Commission seeks opinions on whether portions of the Guide to FCC Form 730 should be implemented as procedural rules and what portions of Form FCC form 730 are no longer necessary.

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***For Forum #3, ACIL's presentation will address the following issues with recommendations aimed at reducing the burden of administering the Part 68 program by the Common Carrier Bureau:***

The present certification process for terminal equipment is a model equipment authorization program. The present registration program provides safeguards which have proven to be very effective. Great care should be taken in considering changes to this program.

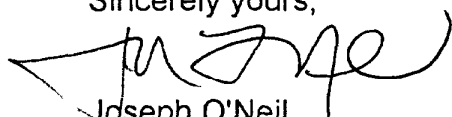
The disadvantage of the present process is that it introduces a delay in the deployment of terminal equipment and creates a heavy administrative burden on the FCC. The FCC has already taken action to address these concerns with the adoption of GEN Docket 98-68. The Commission has mandated the formation of Telecommunication Certification Bodies ("TCB") which will allow the privatization of the equipment authorization procedures. These bodies are scheduled to become operational by January 2000. ACIL recommends that the FCC allow these bodies to become operational immediately to allow the telecommunications industry to take full advantage of this program.

There is great value to small businesses to continue to have the ability to have their products certified as being compliant with the FCC Rules. Such a certification demonstrates to the marketplace that they meet the government regulations. Such demonstration of conformity is important both here in the United States and in foreign markets. Certification is an important tool to the small businesses in dealing with their customers and service providers.

ACIL represents 300 test organizations, several of which have been testing products to the requirements of FCC Part 68 since the inception of the program. ACIL's members have been involved in the process of defining and formulating the designation criteria for TCBs since January 1999, to assist the FCC and NIST in implementing the US/EU MRA. Most ACIL members are small businesses with limited funding who have contributed a great amount of time and resources in assisting the FCC and NIST in this area. Any changes in the FCC Part 68 regulations will have an impact on these small businesses and should be carefully considered.

ACIL respectfully requests the permission to provide an in-person ex-parte presentation as summarized above.

Sincerely yours,

  
Joseph O'Neil  
ACIL Executive Director